

CHRISTOPHER R. ORAM, ESQ
Nevada Bar No. 004349
520 South Fourth Street, Second Floor
Las Vegas, Nevada 89101
(702) 384-5563
E-Mail: contact@christopheroramlaw.com

Attorney for Defendant
EVERLY JAMES

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * * * *

UNITED STATES OF AMERICA,

CASE NO. 2:17-cr-00180-JAD-PAL

Plaintiff,

vs.

EVERLY JAMES

**STIPULATION TO CONTINUE THE
REPLY TO THE GOVERNMENT'S
RESPONSE (ECF No. 254) TO
DEFENDANT'S MOTION TO
SUPPRESS (ECF No. 203)(First Request)**

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through Cristina D. Silva, Assistant United States Attorney, and Everly James, by and through his attorney, Christopher R. Oram, that the Reply to the Government's Response to Defendant's Motion to Suppress, currently due on Monday, January 15, 2018, be continued for two (2) weeks, until January 29, 2018, for the following reasons:

1. Counsel for the Defendant requires additional time to draft a response to the Reply and to discuss the Government's Response with the Defendant.

2. Plea negotiations are continuing in the instant case.

3. The defendant is in custody and does not object to this stipulation.

4. Denial of this request could result in a miscarriage of justice because it prevents counsel for the Defendant from having meaningful discussions with the Defendant concerning the Reply.

1 5. This is the first request to continue the Reply to the Government's Response to
2 Defendant's Motion to Suppress.

3
4 /s/ Cristina D. Silva 01/11/2018

5 CRISTINA SILVA DATE

6 Assistant United States Attorney

/s/ Christopher R. Oram 01/11/2018

CHRISTOPHER R. ORAM DATE

Counsel for Defendant E. James

CHRISTOPHER R. ORAM, LTD.
520 SOUTH 4TH STREET | SECOND FLOOR
LAS VEGAS, NEVADA 89101
TEL. 702.384-5563 | FAX. 702.974-0623

1 Based upon the pending Stipulation of the parties, and good cause appearing
2 therefore, the Court finds that:

3 1. Counsel for the Defendant requires additional time to draft a response to the Reply
4 and to discuss the Government's Response with the Defendant.

5 2. Plea negotiations are continuing in the instant case.

6 3. The defendant is in custody and does not object to this stipulation.

7 4. Denial of this request could result in a miscarriage of justice because it prevents
8 counsel for the Defendant from having meaningful discussions with the Defendant concerning
9 the Reply.


10 5. This is the first request to continue the Reply to the Government's Response to
11 Defendant's Motion to Suppress.

12 For all of the above-stated reasons, the end of justice would best be served by a two
13 week continuance of the deadline for the Defendant to file his Reply to the Government's
14 Response to Defendant's Motion to Suppress.

15 **ORDER**

16 IT IS ORDERED that the Defendant's deadline to respond to the Government's
17 Response to Defendant's Motion to Suppress, currently scheduled for January 15, 2018, be
18 vacated and continued to January 29, 2018.

19 DATED this 17th day of January, 2018.

20
21
22
23
24 
25 THE HONORABLE PEGGY A. LEEN
26 United States Magistrate Judge
27
28